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January 24, 2020

Via ECF

The Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Dan Zhong
Criminal Docket No. 16-614 (AMD)
(Forfeiture - Development Group of NYP, LLC)

Dear Judge Donnelly:

First, please allow me to express my appreciation to the Court and the Government for the one-week adjournment to reply due to the death of my father-in-law.

It is our understanding that other counsel will be filing a substitution of counsel and replacing us in this matter. As a result of new counsel coming in, we cannot take a position on behalf of the client to the Government's January 10, 2020 letter.

Respectfully submitted,

/s/Cathy Fleming
Cathy Fleming

cc: AUSA Brian D. Morris
DGNYP